

**IN THE UNITED STATES DISTRICT COURT
FOR THE WESTERN DISTRICT OF OKLAHOMA**

(1) PENNY EZELL, on behalf of Herself and	}	
All others similarly situated,	}	
	}	
Plaintiff,	}	
	}	
vs.	}	Case No. 12-CV-787-C
	}	
(2) GRACO CHILDREN'S PRODUCTS, INC., and	}	
(3) NEWELL RUBBERMAID, INC.,	}	
	}	
Defendants.	}	

**PLAINTIFF'S MOTION FOR EXTENSION OF TIME
TO RESPOND TO DEFENDANTS' MOTION TO DISMISS
PLAINTIFF'S COMPLAINT WITH PREJUDICE**

Plaintiff, by and through her counsel, pursuant to LCvR7.1(h), hereby requests an extension of time to file her opposition to Defendants' Motion to Dismiss Plaintiff's Complaint with Prejudice. In support of her motion, Plaintiff states the following:

1. The current deadline to respond to Defendants' Motion to Dismiss is August 13, 2012.
2. If this extension is granted, Plaintiff's opposition brief will be due 21 days following this Court's ruling on Plaintiff's upcoming motion to remand this action to the District Court of Pottawatomie County, Case No. CJ-2012-00252.
3. No such prior extension request has been made by Plaintiff.
4. Plaintiff requests the extension because Plaintiff intends to file a motion to remand.
5. Counsel for Defendants does not object to the requested extension.
6. This extension request does not impact trial scheduling or other deadlines.

7. For the foregoing reasons, Plaintiff respectfully requests that this Court allow Plaintiff to file her opposition to Defendants' Motion to Dismiss 21 days from the final disposition of Plaintiff's upcoming motion to remand.

Respectfully submitted,

THE WEST LAW FIRM
ATTORNEYS FOR PLAINTIFF

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CERTIFICATE OF SERVICE

I hereby certify that on the 26th day of July, 2012, I electronically transmitted the attached document to the Clerk of Court using the ECF System for filing and transmittal of Notice of Electronic Filing to the following ECF Registrants:

David V. Jones
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Benjamin G. Kemble
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s/ Bradley C. West
Bradley C. West